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SPECIAL LITIGATION COUNSEL FOR
DEBTOR IN POSSESSION

COUNSEL FOR DEBTOR IN POSSESSION

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

IN RE:	§	CHAPTER 11
	§	
TODD MEAGHER,	§	CASE NO. 20-40208-11
	§	
DEBTOR.	§	

DEBTOR'S WITNESS AND EXHIBIT LIST FOR:

**MOTION TO SELL AND ASSIGN CERTAIN INTELLECTUAL PROPERTY RIGHTS
FREE AND CLEAR OF LIENS, CLAIMS, AND ENCUMBRANCES**

[Relates to Dkt. No. 43]

TO THE HONORABLE MARK X. MULLIN,
UNITED STATES BANKRUPTCY JUDGE:

Debtor TODD MEAGHER respectfully files this Witness and Exhibit List for the hearing on his Motion to Sell and Assign Certain Intellectual Property Rights Free and Clear of Liens, Claims, and Encumbrances. Subject to supplementation, Debtor identifies the following potential witnesses and exhibits:

WITNESSES

1. Todd A. Meagher, Debtor.
2. Nickolas Meagher, Manager and sole member of GHER Solutions, LLC.

EXHIBITS¹

Ex No	Description	Date	Docket	Offered	Objection	Admitted
1	Intellectual Property Purchase and Assignment Agreement		43-1			
2	Declaration of Todd A. Meagher		43-2			
3	Debtor's Schedule F		23			

Additionally, the Debtor expressly reserves the right to amend and add additional witnesses and exhibits, including witnesses or exhibits listed by any other party and/or rebuttal or impeachment witnesses and exhibits, as they are determined to be relevant or helpful by the Debtor or the Court. Moreover, the Debtor reserves the right to use any documents filed in the Reorganization Case subsequent to the filing and serving of this witness and exhibit list, and to move the Court for additional relief, if necessary, including asking the Court to take judicial notice of any documents, pleadings, entries, or orders entered in the bankruptcy case.

¹ Unless expressly stated otherwise, each exhibit listed includes all sub-exhibits and attachments thereto. The Debtor's exhibits are generally available on PACER. Please contact the undersigned if you do not have access to any exhibits and would like a copy emailed to you.

Dated: May 8, 2020

Respectfully submitted,

/s/Robert C. Rowe
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**COUNSEL FOR
DEBTOR-IN-POSSESSION**

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that, on May 8, 2020, the foregoing document was served via the Court's CM/ECF system upon all parties receiving notice thereby.

/s/Robert C. Rowe
Robert C. Rowe